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*Attorneys for Irving H. Picard, Esq. Trustee for the*

*Substantively Consolidated SIPA Liquidation of*

*Bernard L. Madoff Investment Securities LLC*

*And Bernard L. Madoff*

Hearing Date and Time:

February 4, 2010 at 10:00 am

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF FILING OF AMENDED PROPOSED PROTECTIVE ORDER**

PLEASE TAKE NOTICE THAT Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS" or "Debtor") and Bernard L. Madoff ("Madoff"), by and through his undersigned attorneys, files herewith an amended proposed Protective Order in connection with the Motion

for Entry of a Protective Order (the “Motion”)<sup>1</sup> previously scheduled to be heard by the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, the Alexander Hamilton United States Customs House, One Bowling Green, New York, New York 10004, on January 14, 2010, which hearing was adjourned and is currently scheduled to be heard on February 4, 2010 at 10:00 a.m.

A redlined version of the Protective Order, illustrating the changes thereto since the filing of the Motion, is attached hereto as Exhibit A. A clean copy of the Protective Order is attached hereto as Exhibit B. The revisions made to the Protective Order since the filing of the Motion reflect the Trustee’s negotiations with various constituents. The Trustee believes that the concerns raised by these parties have been addressed in the revised draft and, as such, the Trustee is not aware of any remaining opposition to the entry of the Protective Order.

Dated: New York, New York  
February 3, 2010

**BAKER & HOSTETLER LLP**

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Liquidation of Bernard L. Madoff  
Investment Securities LLC And Bernard L.  
Madoff*

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<sup>1</sup> All capitalized terms used and not otherwise defined herein shall have the meaning ascribed to those terms in the Motion.